STATE OF SOUTH CAROLINA **COUNTY OF AIKEN**	**IN THE COURT OF COMMON PLEAS**
SHAKILA GREEN **Plaintiff,** **v.** **ROUND TWO, SARAH BUTLER AND WILLIE BUTLER** **Defendants,**	2016CP0200390 **CIVIL ACTION NO.:** **COMPLAINT** **Jury Trial Requested**

Plaintiff, complaining of the Defendants herein, would respectfully show unto the Court as follows:

1. The Plaintiff is a resident of Aiken County, State of South Carolina.

2. Upon information and belief Defendant Round Two is an adult night club business doing business in Aiken County, State of South Carolina.

3. Upon information and belief Defendants Sarah Butler and Willie Butler are residents of Aiken County, State of South Carolina.

4. Venue is proper pursuant to 15-7-30 of the South Carolina Code of Law, as amended.

5. Jurisdiction is proper pursuant to the Constitution of the State of South Carolina and South Carolina Rules of Civil Procedure.

6. On or about the 11th day of August, 2013, the Plaintiff, a minor at the time, was a guest at the adult business of the Defendants when she shot in both of her legs, causing permanent damage.

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CAUSE OF ACTION

(Negligence)

7. The Plaintiff realleges Paragraphs 1-6 as set forth verbatim herein.

8. Defendants were negligent, negligent per se, grossly negligent, willful, wanton and reckless in the following particulars, with each sufficient to support the relief sought.

a. Failing to properly secure area by performing security checks for weapons as patrons entered the business.

b. Failing to properly check the identification of guests;

c. Failing to maintain proper control of the area;

9. By reason and in consequence of the aforesaid acts and/or omissions of the Defendants, Plaintiff suffered injuries to her body; that the injuries were of such nature as to require the Plaintiff to expend monies for doctors' care and other medical necessities, that all the times since the happening of the accident, Plaintiff has suffered and will continue to suffer great pain and mental anguish, all to their damage in an appropriate amount.

WHEREFORE, Plaintiff prays unto the Court for the following relief;

a. Actual damages in an amount to be determined by a jury;

b. Punitive damages in an amount to be determined by jury;

c. The cost of this action;

d. Such other and further relief as the Court deems just and proper.

This _____ day of February, 2015.

Respectfully submitted,

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